

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AMIRAH IMAN-THIAM,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.
)	1:25-cv-02873-SEG
)	
v.)	[On Removal from State Court of
)	Cobb County, Civil Action No.
PUBLIX SUPER MARKETS, INC.,)	25-A-2262]
)	
Defendant.)	<u>JURY TRIAL DEMANDED</u>
_____)	

JOINT CONSENT MOTION FOR EXTENSION OF DISCOVERY PERIOD

COME NOW Plaintiff Amirah Iman-Thiam and Defendant Publix Super Markets, Inc., by and through their undersigned counsel, and respectfully move the Court for an order extending the discovery period in this case three (3) months up to and including March 27, 2026. In support of this Joint Consent Motion, the parties show the Court as follows:

1. Defendant timely removed this case to this Court on May 23, 2025. See Doc. 1.
2. On July 21, 2024, the Court issued a Scheduling Order establishing a discovery cutoff of December 24, 2025. See Doc. 12.
3. The parties have diligently engaged in discovery to date, including the exchange of interrogatories and requests for production of documents, written

responses thereto, document productions, and subpoenas to third parties. The Parties have also conducted the deposition of Defendant's Store Manager.

4. Between the parties, over ten additional depositions have been requested, including at least two witnesses who reside outside of the United States in Senegal.

5. The parties are also actively engaged in settlement discussions and believe that the reasonable extension of time requested herein would allow them time to potentially engage in meaningful discussions to work towards a settlement before the end of the year. If negotiations are unsuccessful, this extension will allow the Parties sufficient time to conduct the necessary depositions, including the witnesses who reside outside of the country.

6. Counsel for the parties have discussed this matter and both parties consent to the extension requested herein and believe it will serve their respective interests.

7. This is the first request for extension for discovery filed by the parties in this case.

8. This motion is made in good faith and not for the purpose of delay.

9. This enlargement of time will not substantially delay this proceeding, but rather the parties believe that the relief requested herein will facilitate "the just,

speedy, and inexpensive determination” of this matter consistent with Fed. R. Civ.

P. 1.

WHEREFORE, the parties request that the Court enter an order extending the discovery period three (3) months up to and including March 27, 2026, and extending the deadline for dispositive and/or *Daubert* motions for three (3) months up to and including May 29, 2026.

Respectfully submitted this 10th day of November, 2025.

/s/Jonathan S. Tonge

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